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Responsibility For Adherence To The Hartford's Code Of Corporate Conduct

To The Hartford's Employees and Business Partners

Each employee, agent, vendor and other business partner is responsible for adhering to The Hartford's Code of Corporate Conduct in all matters related to The Hartford's business.



If you know or have good grounds for suspecting that any illegal or unethical conduct in violation of this Code has occurred or is planned by anyone, you are expected to report it. You may report it to the Director or Deputy Director, Corporate Policy Compliance at ☎ 860-547-5056, to the Corporate Ombudsman at ☎ 800-289-5012 or to the Department of Special Investigations at ☎ 860-547-6554. Your report, which may be anonymous, will be treated confidentially, and you will in no way be penalized for simply making such a report.

To All Managers of The Hartford

It is your additional responsibility to make sure that all of the employees reporting to you and business partners with whom you deal adhere to the Code of Corporate Conduct in all relevant sections. While lawyers, controllers and internal auditors are available to assist you, the primary responsibility for compliance rests on **your** shoulders, and **this responsibility cannot be delegated.**

To achieve policy compliance, it is your assignment to ensure that all employees and business partners under your supervision are made fully aware of the importance of compliance and understand the procedure for reporting violations.

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It is the policy of The Hartford that employees have the right to work in an environment free of either verbal or physical intimidation and harassment, including sexual harassment. The Hartford will give immediate attention and review to complaints from employees or applicants for employment alleging violation of the policy so as to effect a prompt and just resolution of the matter. In addition, The Hartford will not tolerate intimidation or harassment of or by its customers, producers or vendors.

- **Drug-free workplace and workforce**

It is The Hartford's policy to maintain a drug-free workplace and workforce. Employees are expected to work free from the effects of alcohol or drugs and be able to perform their job duties. This is essential to maintaining required performance levels and ensuring their safety and that of their co-workers.

Selling, distributing, purchasing, possessing, or consuming illegal drugs as well as misuse or abuse of otherwise legally prescribed drugs, on company premises or while on or otherwise engaged in company business, is prohibited. Selling, distributing, purchasing or consuming alcoholic beverages on company premises or while engaged in company business is prohibited except at company-authorized functions.

- **Workplace Violence**

It is The Hartford's intention to provide a workplace that is as safe and free from violence or threats of violence as is feasible. Workplace violence includes threats, threatening behavior, harassment, intimidation, assaults, or similar conduct.

- **Confidentiality of Employee Records**

The Hartford collects and maintains human resources data and records concerning individual employees that are accurate, up to date, relevant to the business relationship and necessary and useful to conduct and administer the affairs of the Corporation. It is The Hartford's policy to safeguard human resources records and files against intrusion, unwarranted disclosure of contents in whole or in part, and improper use. Therefore, only employees having a substantial and legitimate business need will have access to an employee's records. Any employee given access to such records shall safeguard them and shall maintain the confidentiality of information acquired.

- **Federal Insurance Crime Law**

Federal law makes it a crime to employ or do business with persons engaged or participating in the business of insurance who have been convicted of a felony involving dishonesty or a breach of trust. If you know or become suspicious that an employee, agent or broker has been convicted, you must report immediately to the Director or Deputy Director, Corporate Policy Compliance in the Law Department or the Ombudsman. Failure to report may itself result in a crime.

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Relationships with Governments Policy

The Hartford has a responsibility to contribute to the betterment of the communities in which we do business through active involvement in civic and public affairs. This involvement includes participation in policy debates on issues that affect the company, its customers, employees, agents and shareholders. Employees are likewise encouraged to participate as private individuals, on their own time, in the civic and political life of their communities.

- **Contacts with Government Officials**

The government affairs department is responsible for developing and implementing The Hartford's public policy in support of business objectives. Contacts with government officials to influence legislation, regulatory policy or rule-making, including grassroots lobbying contacts, shall be undertaken only at the direction of the government affairs department. The hiring of outside counsel or public affairs firms to lobby on behalf of the company requires the advance knowledge and approval of the government affairs department.

Contacts with insurance departments and other government agencies to comply with routine regulatory requirements do not require clearance from the government affairs department. However, the government affairs department should be notified if outside counsel are retained to pursue any regulatory issue.

Employees involved in sales activities with government entities may be subject to lobbying and gift laws in some jurisdictions and should consult with the law department or the corporate compliance department before contacting public officials.

- **Entertainment or Gifts for Government Officials**

Many jurisdictions prohibit or limit meals and gifts purchased for public officials, regardless of whether they are purchased in connection with lobbying activity. The Hartford's employees must consult with the law department prior to entertaining public officials to determine local requirements. Gifts of tickets, trips, hotels, transportation or other items of value are prohibited unless first cleared with the Director, Corporate Policy Compliance.

- **Employee Political Involvement**

Employees are encouraged to become involved in the political process as private individuals or on behalf of The Hartford. Employees are free to express their political views, support candidates of their choice or run for elective office on their own time and at their own expense. Employees may request reasonable adjustments in work schedules or a leave of absence without pay, subject to their supervisor's approval, to campaign for elective office. Employees may hold part-time elective office as long as it does not interfere with job performance or otherwise present a conflict of interest. Employee participation in grassroots lobbying campaigns on behalf of The Hartford is strictly voluntary.

- **Political Contributions**

The Hartford shall not contribute money, services or anything of value, either directly or indirectly, to promote a particular candidate or political party. The use of The Hartford's staff or facilities to promote partisan political activity is regarded as an "in-kind" contribution in

dismissal by The Hartford as well as criminal prosecution by federal authorities.

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The Hartford's Conflict of Interest Policy

General

The Hartford's employees are to exercise sound judgment guided by the highest personal standards of honesty and integrity in all matters affecting The Hartford. No employee may abuse a corporate position for personal advantage or promote any actions contrary to The Hartford's stated ethical standards. The following describes rules that apply to employees generally. Some departments may adopt stricter rules as circumstances require.


Required Disclosures

The Hartford's employees shall attempt to avoid conflicts of interest, and in case an apparent conflict of interest develops, employees shall disclose the facts promptly to their supervisor or to the Human Resources Generalist for their area who, when appropriate, will contact the Director, Corporate Policy Compliance regarding the proper action.

- **Outside employment**—No employee shall be affiliated, full-time or part-time, as an employee, consultant or in any other capacity with a competitor, customer, or supplier of The Hartford without prior written approval of the Director, Human Resources or designee.
- **Financial Interest** — No employee having any influence on The Hartford's business decisions, and no member of such an employee's immediate family, may have any substantial financial interest such as stockholder or other type owner or creditor, in a non-publicly owned enterprise, if a substantial part of such enterprise's business consists in acting as a competitor, customer or supplier of The Hartford, without prior written approval of the Director, Human Resources.
- **Outside Business**—Executive, managerial, professional and technical employees engaged in any non-Hartford business shall fully disclose the relevant facts to their supervisors and their Human Resources Generalist.
- **Undue Influence**—All employees shall disclose to their supervisors any family or personal relationships that might give the appearance of influencing employee judgment to their personal advantage or to the undue advantage of a third party in any dealings between such third party and The Hartford. No employee shall use The Hartford facilities, property assets, or working time to promote any non-Hartford interest of the employee or of third parties without prior consent of the supervisor.
- **Forbidden Payments**—No employee shall take or approve action resulting in incurring, or paying, the cost of anything from corporate funds if such an expenditure is not authorized or not reimbursable under company policy.
- **Confidential Information** — No employee shall disclose or use any confidential information gained in the course of The Hartford's employment for the personal profit or advantage of the employee or of any other person.

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- **Gifts and Gratuities**-- Employees and their immediate families shall not accept any benefit, gift, personal favor, discount, remuneration or entertainment the nature of which goes beyond those courtesies usually associated with accepted business practice or which raise any implication that could be construed as affecting their judgment or decision-making process on behalf of The Hartford or any person connected

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Standard of Ethics Policy

As a Hartford employee, agent or business partner, you must perform all of the duties related to The Hartford in accordance with the highest ethical standards and in conformity with applicable law. Under no circumstances may you directly or indirectly engage in any corrupt or illegal practice, including without limitation, bribery, kickbacks or payoffs. The Hartford's managers must take all actions necessary to ensure that no Hartford entity, employee, agent or business partner engages in any conduct which does not measure up to this standard.

- **Use of The Hartford's Funds and Assets**

Each manager shall maintain an adequate system of internal controls which provides reasonable assurance that assets are safeguarded, transactions are executed in accordance with management's authorization and properly recorded, financial records are accurate and violations of this Code are detected and corrected.

- **Conduct with Government Employees**

No Hartford employee shall authorize or offer any gifts or gratuities, even of a token nature, for personal use, or non-business related entertainment to employees of any government agency to which The Hartford is seeking to sell or is selling goods or services without prior consultation with the Director, Corporate Policy Compliance. Policy does not, however, prohibit offering a gratuity to an employee of a non-US government entity to obtain timely, routine service to which the payer is entitled in countries where this practice is common and legal.

- **Sales Agents - Commercial**

Managers must ensure that every agreement with sales agents or representatives is in writing, signed by the parties, and contains all terms agreed upon. The agent, its employees, and owners must be engaged in providing legitimate business services for a fee at or near the customary local rate for services, and be free of involvement with existing or potential customers of The Hartford. Any payment made to sales agents or representatives must be fully documented.

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